STATE OF MARYLAND
DEPARTMENT OF THE ENVIRONMENT
HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION
ENFORCEMENT PROGRAM
2500 BROENING HIGHWAY
BALTIMORE, MARYLAND 21224
(301) 631-3400

FI 990714/BC 040 Inspector: Eugene W. Peters Date: 07/14/99

GENERATOR CHECKLIST

Facility Name: MTA - Washington Blvd Shop

Address: 1515 Washington Blvd

Facility Representative: Henry Heine Telephone No.: (410) 333-2076

Description of Work Activity: Fleet Vehicle Maintenance

EPA Identification Number? M-D-R-0-0-0-0-0-6-1-9-7

Section A - Hazardous Waste Determination

1. Does facility generate hazardous waste(s) as defined in COMAR 26.13.02.10 - .19? .... ✓ Yes ___ No

   If yes, under which catagory is the waste?

   ✓ Ignitable ___ Corrosive ___ Reactive ✓ EP Toxic ✓ RCRA Listed
   F002 F003 ...

2. Describe the amount of waste generated (day, week or month).

   > 1000 KGS/MONTH

Section B - Manifest (26.13.03.04)

1. Does generator ship waste off-site? .... ✓ Yes ___ No
   (If no, do not complete sections B and C)
2. Does generator use manifest? .... ✓ Yes ___ No
   If no, explain: ______
3. Does generator retain copies of manifests? .... ✓ Yes ___ No ___ N/A
   If yes, does the manifest include the following information? (26.13.03.04C)
   - -Manifest document number? .... ✓ Yes ___ No ___ N/A
   - -Generator's name, mailing address and telephone number? .... ✓ Yes ___ No ___ N/A
   - -Generator's EPA I.D. number? .... ✓ Yes ___ No ___ N/A
   - -Transporter name(s) and EPA I.D. number(s)? .... ✓ Yes ___ No ___ N/A
   - -Designated TSDF name, address, and EPA I.D. number? .... ✓ Yes ___ No ___ N/A
   - -Alternate TSDF name, address, and EPA I.D. number? .... ✓ Yes ___ No ___ N/A
   - -Instructions to return waste to generator if undeliverable? .... ✓ Yes ___ No ___ N/A
   - -Description of the waste required by DOT regulations? .... ✓ Yes ___ No ___ N/A

-Quantity of each hazardous waste by units of weight or volume?....___Yes___No___N/A
-Total number and types of containers given to transporter?.....___Yes___No___N/A
-Is the proper certification noted on each manifest?.....___Yes___No___N/A
Has the generator signed and dated manifests (26.13.03.04E)?.....___Yes___No___N/A
Did the generator obtain initial transporter's signature and date of acceptance?.....___Yes___No___N/A

6. Do returned copies of manifest include facility owner/operator signature and date of acceptance?.....___Yes___No___N/A
7. Have manifests been retained for three years?.....___Yes___No___N/A

Section C - Pre-Transport Requirements (26.13.03.05) ___N/A

1. Does generator package wastes in accordance with DOT requirements?....___Yes___No
2. Are containers in good condition?.....___Yes___No
   If no, explain:_____
3. Is the date that accumulation time began clearly marked and visible for inspection on each container?.....___Yes___No
4. Is period of accumulation less than 90 days?.....___Yes___No
   -If no, is amount accumulated less than 500 kg or less than 1 kg of acute hazardous waste?.....___Yes___No___N/A
   -If no, explain:_____
5. Is "SATELLITE ACCUMULATION" no more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste?.....___Yes___No___N/A
6. Are containers in good condition, closed, and clearly marked "HAZARDOUS WASTE"?.....___Yes___No___N/A

Section D - Recordkeeping and Reporting (26.13.03.06)

1. Does the generator keep the following reports for three years?
   -Manifests and signed copies from designated facilities?.....___Yes___No
   -Annual Reports?.....___Yes___No
   -Exception Reports?.....___Yes___No___N/A
   -Waste Analyses?.....___Yes___No___N/A

Section E - Special Conditions (26.13.03.07)

1. Has the generator received from or transported to a foreign country any hazardous waste(s)?.....___Yes___No
   -If yes, has a notice been filed with MDE and EPA?.....___Yes___No___N/A
   -Is this waste manifested and signed by a foreign consignee?.....___Yes___No___N/A
   -If generator transported wastes out of the country, has confirmation of delivery been received?.....___Yes___No___N/A

Section F - General Requirements (26.13.03.05E)

Personnel Training (26.13.05.02G)

1. Does the owner/operator maintain personnel training records?.....___Yes___No
   If yes, do they include:
   -Job title and written job description of each position?.....___Yes___No
   -Description of type and amount of training?.....___Yes___No
   -Records of training given to facility personnel?.....___Yes___No

Preparedness and Prevention (26.13.05.03)

1. Is there evidence of fire, explosion, or contamination of the environment?.....___Yes___No

2. Is the facility equipped with:
   a. Internal communication or alarm system?.....___Yes___No
   b. Telephone or two-way radio to call emergency response personnel?.....___Yes___No
   c. Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment?.....___Yes___No
   d. Water of adequate volume for hoses, sprinklers, or water spray system?.....___Yes___No
3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment in an emergency?.....___Yes___No
4. Has the owner/operator made arragements with the local authorities to familiarize them with characteristics of the facility?.....___Yes___No
5. In the case that more than one police or fire department might respond, is there a designated primary authority?.....___Yes___No
6. If State or local authorities decline to enter into these arrangements,, has this been documented in the operating log?.....___Yes___No___N/A

Contingency Plan and Emergency Procedures (26.13.05.04)

1. Is a contingency plan maintained at the facility?.....___Yes___No
   If yes, does contingency plan include:
   -Arrangements with local emergency response organizations?.....___Yes___No
   -Emergency coordinators' names, phone numbers, and addresses?.....___Yes___No
   -List of all emergency equipment at the facility and description of equipment?.....___Yes___No
   -Evacuation plan for facility personnel?.....___Yes___No
2. Is there an emergency coordinator on site or on call at all times?....___Yes___No
3. Has a copy of the Contingency plan been submitted to local or State agencies that may be asked to provide emergency services?.....___Yes___No
. Has the plan ever been implemented?.....___Yes___No
   -If so, was the plan appropriate?.....___Yes___No___N/A
   If the plan was <u>not</u> appropriate, has it been amended?.....___Yes___No___N/A
   -If the plan was implemented, was the incident recorded in the operating log and was a written report submitted to MDE?.....___Yes___No___N/A

Use and Management of Containers (26.13.05.09)

1. Are containers in good condition?.....___Yes___No
2. Is container made of a material that will not react with the waste which it stores?.....___Yes___No___N/A
3. Are containers always closed when holding hazardous waste?.....___Yes___No
4. Are containers handled so that they will not be opened, handled, or stored in a manner which may rupture them or cause them to leak?...___Yes___No
5. Does owner/operator inspect containers at least weekly for leaks and deterioration?.....___Yes___No
6. Do container storage areas have adequate containment systems?.....___Yes___No
7. Are containers holding ignitable and reactive waste located at least 15m (50 ft) from facility property lines?.....___Yes___No___N/A
8. Are incompatible wastes or materials placed in the same containers?...___Yes___No___N/A
9. Are hazardous wastes placed in washed, clean containers when they previously held incompatible waste?.....___Yes___No___N/A
10. Are incompatible hazardous wastes separated from each other by a berm, dike, wall, or other device?.....___Yes___No___N/A

Annual Reports (26.13.03.06B)

1. Does the facility submit annual reports to MDE?.....___Yes___No
   If yes, do reports contain the following information?
   a) Name,address and EPA I.D. number of facility?.....___Yes___No
   b) Date and year covered by report?.....___Yes___No
   c) Description/quantity of hazardous waste?.....___Yes___No
   d) Description of efforts to reduce volume/toxicity of waste generated, and actual comparisons with previous year?.....___Yes___No
   e) Certification signed by owner/operator?.....___Yes___No

Section G - Other Checklists Completed: ___N/A

_____ Tanks
_____ Transporter
_____ Land Disposal Restrictions
_____ TSD Facility
_____ Surface Impoundment
_____ Waste Pile
_____ Land Treatment
_____ Landfill
_____ Incinerator
_____ Thermal Treatment
_____ Groundwater Monitoring

Section H - Additional Comments

Exhibit 2-4
Pre-Inspection Worksheet

TASK COMPLETED	DESCRIPTION OF ACTIVITY
N/A	Contact/Coordinate with other offices and agencies – – –
7/14/99	Complete/verify the general information section of the inspection report
	Identify and Obtain All Relevant Information:
7/5/99	Manifest history
7/15/99	Notification form
N/A	Part A permit application
N/A	Previous inspection reports INITIAL INSPECTION
7/15/99	Correspondence
N/A	Part B permit application (if available)
7/14/99	Annual reports
N/A	Final Part B permit (if available)
N/A	Enforcement documents
	Other
	Assemble Inspection Package:
7/12/99	Notification form
N/A	Part A permit application
N/A	Previous inspection reports
7/12/99	Waste generation and characterization information
7/12/99	Information from air and water pollution control agencies or offices
7/14/99	Inspection checklists
7/14/99	Copies of state statutes and regulations or Federal laws and regulations
7/14/99	General inspection equipment (e.g., camera and film)
7/12/99	Safety equipment
7/14/99	Paperwork
7/14/99	Agency identification card
N/A	Sampling equipment (if necessary)
	Other
	Scheduling the Investigation:
N/A	Letters of intent to visit/inspect
7/6/99	Establish date(s) of the inspection
N/A	Follow-up telephone call to confirm date(s) of the inspection and to request that additional information be made available at time of inspection
7/14/99	Complete inspection plan
N/A	Notify interested agencies of EPA staff schedule
	Other

1. General Site Inspection Information Form

SITE NAME: MTA

B. STREET (or other identifier): 1515 WASHINGTON BLVD.

C. CITY: BALTIMORE D. STATE: MARYLAND E. ZIP CODE: 21230 F. COUNTY NAME: BALTIMORE CITY

G. SITE OPERATOR INFORMATION

1. Name: MTA

2. Telephone Number

3. Street: 1515 WASHINGTON BLVD 4. City: BALT 5. State: MD 6. Zip Code: 21230

7. Facility Contact/Telephone No.: HENRY HEINE (410) 333-2674 - JAMES

8. Responsible Official/Telephone No.

H. SITE DESCRIPTION: FLEET VEHICLE MAINTENANCE

I. TYPE OF OWNERSHIP

___ 1. Federal ___ 2. State ___ 3. County ___ 4. Municipal ___ 5. Private

FUNCTION

___ 1. Generator ___ 2. Transporter ___ 3. Treatment ___ 4. Storage ___ 5. Disposal

K. REGULATORY STATUS N/A

___ 1. Interim Status

___ 2. Permitted Facility

___ 3. Part B Permit Application Submitted

___ 4. Part B Permit Application in Preparation

L. INSPECTOR INFORMATION

1. Principal Inspector Name: EUGENE W. DEVORE

3. Organization: MDE/WMS

2. Title: SANITARIAN III

4. Telephone No. (area code and No.): (410) 631-3400

M. INSPECTION PARTICIPANTS

FACILITY REPS

1. HENRY HEINE - MAINTENANCE FOREMAN
2. RICHARD WITT - CHIEF SHOP SUPPORT
3.
4.
5.
6.
8.
9.
10.

Generator:
MASS TRANSIT ADMINISTRATION

Date: 07/14/99

Address:
1515 WASHINGTON BLVD
ST. MORE, MARYLAND
21230

EPA ID No.
MDR000001497

County:
BALTIMORE CITY

MDE Inspector:
EUGENE DETOISE

Contact Person:
HENRY HEINE

Telephone:
(410) 631-3400

Please describe briefly the CHS generating operation:
PRIMARILY FROM FLEET VEHICLE MAINTENANCE
1) D008/D018/D039/D040 — EQUIPMENT PARTS CLEANING
2) SLUDGE FROM HIGH PRESSURE STEAM CLEANING (D007/D008)
3) AC COMPRESSOR OIL - F002, 4) PAINT RESIDUE/SOLVENT D001/F003/F005

The waste generated is:

(a) Recovered or recycled on-site _____ off-site_____
(b) Treated on-site_____ off-site___/___ (c) Disposed of _____

Please explain briefly any recovery or treatment possibilities which were considered to further reduce the volume of or the hazard that the CHS poses to the environment according to the F[illegible]onment Title 7-205 of the Annotated Code of Maryland. Please indicate any efforts made in [illegible]egard.

1) RECYCLING OF CLEANING MIXTURE USED DURING HIGH PRESSURE STEAM CLEANING,
2) USAGE OF PARTS CLEANING UNITS WHICH RECYCLES SOLVENT, MINIMIZING VOLUME OF WASTE SOLVENT ACTUALLY GENERATED

EVALUATION BY MDE'S POLLUTION PREVENTION STAFF

Did the generator demonstrate to your satisfaction that recovery possibilities have been considered and that CHS volume and toxicity cannot be reasonably reduced further:

Yes___/___ No____

Recommended action: _____

_____

_____

Eugene W. DeJoie 07/14/99 _____ _____
Staff Signature Date Supervisor Date

MASS TRANSIT ADMINISTRATION — MDR 00000697

III. GENERATOR REQUIREMENTS

A. Wastewater/Non Wastewater Category and Treatability Group/Treatment Standard Identification*

*Note: This information is generally available on LDR notifications. If not, waste profile data and other documentation should be checked.

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate Wastewater/Non Wastewater Category and treatment standard for each F-solvent?

Yes ✓ No ___ NA ___

If available, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Non Wastewater
F002		X
~~F003/F005~~		X

Comments _____

* Less than 1 percent by weight total organic carbon (TOC), or less than 1 percent by weight total F001- F005 solvent constituents listed in §268.41, Table CCWE. (§268.2(f)(1))

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each dioxin waste?

Yes ___ No ✓ NA ___

If yes, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Non Wastewater

Comments _____

* Less than 1 percent TOC by weight and less than 1 percent total suspended solids (TSS) by weight. (§268.2(f))

3. First, Second, and Third Third Wastes:

a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

Yes ✓ No ___ NA ✓

End

C. Does the facility handle the following wastes (national capacity variances)?

1. Debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, or vitrification. See Appendix A (expires - 05/08/94). (§268.5)

Yes ___ No ___ List _____

2. Inorganic solid debris as defined in §268.2(g)*; includes chromium refactory bricks carrying EPA Hazardous Waste Nos. K048-K052 (expires - 05/08/94). (§268.35(c))

Yes ___ No ___ List _____

*Note: Incorrect reference (§268.2(a)(7)) in Third Third rule.

3. Debris contaminated with wastes listed in §268.12, and/or debris contaminated with any characteristic wastes for which treatment standards are established in Subpart D of Part 268 (expires 05/08/94). (§268.35(e)(1))*

Yes ___ No ___ List _____

*Note: Generator must demonstrate a good faith effort to locate treatment capacity suitable for its waste, utilize such capacity if found available, or file a report as required by §268.5(g) by August 12, 1993 or within 90 days after the hazardous waste is generated (whichever is later) describing the generator's efforts to locate treatment capacity.

4. Mixed radioactive hazardous debris contaminated with wastes listed in §268.12 and mixed with radioactive hazardous debris contaminated with any characteristic waste for which treatment standards are established in 40 CFR Part 268, Subpart D (expires 05/08/94). (§268.35(e)(2))*

Yes ___ No___ List _____

*Note: Generator must demonstrate a good faith effort to locate treatment capacity suitable for its waste, utilize such capacity if found available, or file a report as required by §268.5(g) by August 12, 1993 or within 90 days after the hazardous waste is generated (whichever is later) describing the generator's efforts to locate treatment capacity.

If available, list each waste code and check the correct treatability group:

Waste Code	Subcategory	Wastewater*	Non Wastewater

* Less than 1 percent TOC by weight and less than 1 percent total suspended solids (TSS) with the following exceptions: K011, K013, and K014 wastewaters (as generated) -- less than 5 percent by weight TOC and less than 1 percent by weight TSS; K103 and K104 wastewaters (as generated) - less than 4 percent by weight TOC and less than 1 percent by weight TSS. (§268.2(f)(2) and (3))

Comments _____

b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? (§268.9 (b))

Yes ___ No ___ NA ___

c. Does the generator specify alternative treatment standards for lab packs?* (268.42(c))

Yes ___ No ___ NA ___

*Use of the alternative treatment standards is not required. (55 FR 22629)

If yes, do lab packs only contain the following wastes?* (§268.42(c)(2))

___ Organometallics: Part 268, Appendix IV constituents
___ Organics: Part 268, Appendix V constituents

* Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. (55 FR 22629)

d. Does the generator specify the treatment standards for the relevant F039 multi-source leachate constituents?*

Yes ___ No ___ NA ___

*Use of the alternative treatment standards is required. (55 FR 22619)

4. California List Wastes: Has the generator correctly identified the wastewater/non wastewater category and treatment standard/prohibition level for the following wastes? (55 FR 22675)

a. Liquid hazardous wastes containing PCBs ≥50 ppm (268.32(a)(2))

Yes ___ No ___ NA ___

If yes, check the appropriate category (treatability group) (see §268.42(a)(1)):

___ 50 to 500 ppm PCBs
___ ≥500 ppm PCBs

b. Listed or characteristic wastes containing ≥1,000 mg/l (liquids) or ≥1,000 mg/kg HOCs, (non-liquids), which are not declared hazardous by the HOC content (55 FR 22675)

Yes ___ No ___ NA ___

If yes, check the appropriate category (see §268.42(a)(2)):

___ Dilute HOC wastewater with 1,000 mg/l to 10,000 mg/l HOCs) (268.32(a)(3))
___ All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids) (268.32(e)(1) and (2))

c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥134 mg/l nickel and/or ≥130 mg/l thallium (55 FR 22675)

Yes ___ No ___ NA ___

5. National Capacity Variance Wastes: Have all applicable California List prohibitions been identified for wastes covered under national capacity variances? (See Appendix A.)

Yes ___ No ___ NA ___

If a waste stream contains a mixture of wastes, and a variance only applies to some of the waste codes, has the generator identified all applicable treatment standards and California List prohibitions? (See Appendix A.)

Yes ___ No ___ NA ___

If California List prohibitions apply to wastestreams managed by the generator, complete the following table for each waste code, noting the date on which relevant national capacity variances expire.

Waste Code	Cal. List Applicability	Expiration Date
_____	_____	___/___/___
_____	_____	___/___/___
_____	_____	___/___/___

Comments _____

6. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in §268.42?

Yes ___ No ___ NA ___

If yes, list the waste code, the technology specified in §268.42, the alternative method, and documentation of approval. (§268.42(b))

Waste Code	Required Technology	Alternative Method	Approval

Comments _____

7. Does the generator mix multiple restricted wastes all containing a common constituent of concern, but which have different treatment standards?

Yes ___ No ___

If yes, did the generator select the most stringent treatment standards? (§§268.41(b) and 268.43(b))

Yes ___ No ___ n/a

Comments _____

B. Waste Analysis

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation?* (§268.7(a) (53 FR 31208))

Yes ___ No ___

* Note: This determination may be made at the point of disposal if the waste only has a prohibition level in effect (52 FR 25765).

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes ___ No ___

Comments _____

2. Which of the following analytical methods does the generator employ?*

*Note: A "No" answer to applicable questions b through d does not necessarily constitute a violation. However, knowledge of waste is rarely adequate if a generator certifies that treatment standard criteria have been met.

a. Knowledge of waste:

Yes ✓ No ___

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. (§268.7(a)(5))

MSDS LABEL INFO TECHNICAL ESSAYS

b. TCLP*: Are wastes with treatment standards specified in §268.41 analyzed using TCLP?** (BDAT*** = stabilization/immobilization technology)

Yes ✓ No ___ NA ___

*TCLP = Toxicity Characteristic Leaching Procedure (Part 268, Appendix I, EPA Test Method 1311).

**See Section 268.40(a) for options for using TCLP or EP test methods.
***BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, identify the frequency of testing, and note any problems. Attach test results. (§268.7(a)(5))

1) D007/D008 RESIDUES FROM HOT PRESSURE STEAM CLEAN
2) D008/D018/D039/D040 - PARTS CLEANING SOLVENT - ANALYSIS AS PER SUPPLIERS WASTE ANALYSIS PLAN

c. Total constituent analysis: Are wastes with treatment standards specified in §268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology)

Yes ___ No ___ NA ✓

*See Appendix C for exceptions.
If yes, list the wastes for which total constituent analysis was used and provide the date of last test, identify the frequency of testing, and note any problems. Attach test results. (§268.7(a)(5))

d. Is the paint filter liquids test (PFELT) used to determine if California List wastes are *liquid* hazardous wastes?

Yes ___ No ___ NA ✓

*PFLT = Paint Filter Liquids Test (Test Method 9095, EPA Publication No. SW-846)

If yes, list the wastes for which PFLT was used and provide the date of last test, identify the frequency of testing, and note any problems. Attach test results. (§268.7 (a)(5))

_____

_____

3. Does the generator treat restricted wastes in 90-day tanks or containers regulated under §262.34 (permissible in some states)?

Yes ___ No ✓ (If No, go to 4.)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes ___ No ✓

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? (§268.7(a)(4))

Yes ___ No ___ (If No, go to 4.) N/A

Does the plan fulfill the following? (§268.7(a)(4)(i))

___ Based on a detailed chemical and physical analysis of a representative sample

___ Contains information necessary to treat the wastes in accordance with Part 268 requirements

Has the plan been filed with the Regional Administrator (return receipt, Federal Express slip, etc. required for verification)? (§268.7(a)(4)(ii))

Yes ___ No ___

Comments _____

_____

4. Dilution Prohibition (§268.3):

a. Does the generator mix prohibited* wastes with different treatment standards?

*See Appendix C for distinction between restricted and prohibited wastes.

Yes ___ No ___ (If No, go to b.)

List the wastes_____

Are the wastes amenable to the same type of treatment? (55 FR 22666)

Yes ___ No ___ N/A

Comments _____

b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? (55 FR 22665-22666)

Yes ___ No ___ (If No, go to c.)

Check appropriate category:

___ Dilutes to meet treatment standards
___ Dilutes to render waste non-hazardous

Do the wastes fall into the following categories? (Check if appropriate.)

___ Characteristic wastes managed in treatment systems regulated under the Clean Water Act (§268.3(b)), (55 FR 22665)
___ Treatment standard specified in §§268.41 or 268.43

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

_____

c. Based on an assessment of points a and b, and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? (§268.3(a))

Yes ___ No ___

Comments _____

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in §§268.41 and 268.43? (55 FR 22620)

Yes ___ No ___ NA ___

C. Management

1. On-Site Management

a. Are restricted wastes treated or (other than in a RCRA exempt unit) stored for greater than 90 or 180 days, or disposed on site?

Yes ___ No ___

(If yes, the TSD Checklist must also be completed.)

Comments_____

b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? (§268.7(a)(6)) (55 FR 22662)

Yes ___ No ___ NA ___

c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted prior to entering the exempt unit (§268.7(a)(6)) until the applicable treatment standards are met?* (§268.9(d))

Yes ___ No ___ NA ___

* This applies to both concentration based treatment standards specified in §§268.41 and 268.43, and to some §268.42 required methods which result in treatment below the characteristic level. See Appendix D.

d. If a waste is excluded from regulation or from the definition of solid or hazardous waste subsequent to the point of generation, does the generator comply with the requirements of §268.7(a)(6) (56 FR 3866-3867)? If the generator determines that he is managing a restricted waste that is excluded from the definition of hazardous or solid waste or exempt from Subtitle C regulation, under §§261.2-261.6 subsequent to the point of generation, is there a one-time notice in the facility's file stating such generation, subsequent exclusion from the definition of hazardous or solid waste or exemption from Subtitle C regulation, and the disposition of the waste?

2. Off-Site Management: Waste Exceeds Treatment Standards

a. Does the generator ship any waste that exceeds treatment standards/ prohibition levels (not subject to a national capacity variance) to an off-site treatment or storage facility?

Yes ✓ No ✓ cont (If No, go to 3.)

Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
D008/D018/D039/D040	Safety Kleen MAD981034291
Remainder →	Cycle Chem
F002/F003/F005 D001/D008	NJD002200046

Does the generator provide a notification to the treatment or storage facility? (§268.7(a)(1))

Yes ✓ No ___ (If No, go to 3.)

If the generator specifies alternative treatment standards for lab packs, is the certification required in §268.7(a)(8) or (9) included with the notification?

Yes ___ No ___ NA ✓

b. Is a notification sent with each waste shipment?

Yes ✓ No ___

If no, is the waste subject to a tolling agreement pursuant to §62.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? (§268.7(a)(10))

Yes ___ No ___

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes ___ No ___ (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

Waste Code	Receiving Facility
___	___
___	___
___	___

Does the generator provide a notification and a certification to the disposal facility? (§268.7(a)(2)(i) and (ii))?

Yes ___ No ___ N/A (If No, go to d.)

b. Are a notification and a certification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to §262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to c.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
___	___
___	___
___	___

Did the small quantity generator provide a notification and a certification to the receiving facility with the first waste shipment subject to the tolling agreement? (§268.7(a)(10))

Yes ___ No ___

c. Are characteristic wastes which have been rendered non-hazardous shipped to a Subtitle D facility?

Yes ___ No ___ NA ___ (If No or NA, go to 4.)

Complete the following table:

Waste Code	Receiving Facility

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? (§§268.9(d)(1) and 268.7(b)(5))?

Yes ___ No ___

4. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

a. Does the generator ship wastes to a treatment, storage, or disposal facility which are subject to a national capacity variance (Part 268, Subpart C), or case-by-case extension (§268.5)?

Yes ___ No ___ (If No, go to 5.)

Complete the following table:

Waste Code	Receiving Facility

Does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal? (§268.7(a)(3))

Yes ___ No ___

b. Is a notification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to §262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 5.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? (§268.7(a)(10))

Yes ___ No ___

5. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? (§268.7(a)(7))

Yes ✓ No ___

Are copies of relevant tolling agreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? (§268.9)

Yes ✓ No ___ NA ___

Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case by case extensions and the soft hammer provision*?

Yes ___ No ___ NA ✓

* See Appendix B. Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

Comments_____

D. Treatment Using RCRA 40 CFR Parts 264 and 265 Exempt Units or Processes

1. Are restricted wastes treated in RCRA exempt units (e.g., distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes ___ No ✓ (If No, do not complete this section.)

List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units and Processes

2. Are treatment residuals generated from these units?

Yes ___ No ___

Comments_____

3. Are residuals further treated, stored for greater than 90/180 days, or disposed on site?

Yes ___ No ___ NA ___

(If yes, the TSD checklist must also be completed.)

E. Additional Comments, Concerns, or Issues Not Addressed in the Checklist:

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF REGULATED WASTE ACTIVITY

(VERIFICATION)

This is to acknowledge that you have filed a Notification of Regulated Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

MDR000086157 10/24/95

INSTALLATION ADDRESS

MASS TRANSIT ADMINISTRATION
1515 WASHINGTON BLVD
BALTIMORE , MD 212301794
HENRY HEINE MAINT-ENG

1515 WASHINGTON BLVD
BALTIMORE ,MD 212301794

EPA Form 8700-12A (6-90)

STATE OF MARYLAND
DEPARTMENT OF THE ENVIRONMENT
WASTE MANAGEMENT ADMINISTRATION
2500 BROENING HIGHWAY, BALTIMORE, MARYLAND 21224

Type of Inspection/Observations: Compliance Evaluation Inspection (CEI)

Facility/Identifier: MTA Washington Blvd. Maintenance Shop

Date: 07/14/99 *EPA ID # MDR000006197*

Inspector: Eugene DeJoise *Facility Representative(s):* Henry Heine

REPORT OF OBSERVATIONS

PURPOSE

I conducted this inspection in order to determine this facility's hazardous waste generator status and waste management practices. The MTA facility is recognized by the USEPA as a large quantity generator (LQG) of hazardous wastes. An LQG generates in excess of 1,000 kilograms (2,200 lbs.) of hazardous wastes per month.

OWNER/OPERATOR

The MTA facility is owned and operated by the Mass Transit Administration. All correspondence regarding environmental concerns can be mailed directly to the facility located at 1515 Washington Blvd., Baltimore, Maryland 21230.

FACILITY REPRESENTATIVES

I met with Richard Wilt, Chief - Shop Support, and Henry Heine, Maintenance Engineer. I advised Mr. Wilt concerning the purpose of this inspection. Mr. Heine accompanied me during my inspection of facility operations and provided the records for my review.

FACILITY DESCRIPTION

The MTA operates the Central Maintenance Yard at the above referenced location. The MTA provides maintenance for its fleet of passenger vehicles, including transit buses, light rail trains and automobiles. These maintenance activities include a full range of vehicle engine repair and body shop activities. The maintenance activities are performed primarily within two separate and adjacent buildings maintained on the MTA property.

NON HAZARDOUS WASTE STREAMS

The MTA generates a variety of waste oils and fluids during engine repair and maintenance operations. The waste oils, including lubrication fluids of all types, are maintained within an above ground waste oil tank. Prior to removing the waste oil for recycling off site, the MTA insures that the waste oil is analyzed to determine the presence of all regulated constituents and has, to date, shipped the oil to used oil recyclers. The filter cartridges are removed periodically from the antifreeze recycler and discharged into the trash. Mr. Heine advised that the MTA is installing an oil spill containment system within all storm water runoff drain ways. The system consists of an absorbent material that is placed within a drain way. The socklike extension of the material is designed to trap all an oil residue that would otherwise discharge through the drain way.

HAZARDOUS WASTES

The MTA generates an array of hazardous wastes during routine facility operations and building maintenance. Parts cleaner solvent wastes (D008/D018/D039/D040) are generated during routine equipment and parts cleaning (does not include engine parts). The MTA utilizes an engine and transmission parts cleaner consisting of high pressure water/steam and a mildly corrosive cleaning solution. The solution mixture is recycled through a filtration unit that traps solid and a semi solid residue. The residue is characterized as a hazardous waste, due to the presence of lead and cadmium (D007/D008 - TCLP), upon periodic removal from the filtration unit. The MTA services the Fleet vehicles' air conditioning systems. Due to the composition of the compressor oil utilized for air conditioning, the oil is characterized and handled as hazardous waste (F002). Additionally, the MTA maintains a vehicle body repair and repainting shop on the premises. All thinner and paint residues, generated primarily during the cleaning of the spray paint application guns, have been characterized as "mineral spirit" hazardous wastes(D001/F003/F005).

During 1997, as determined from a review of the most recent Biennial report, the MTA generated a sand blast residue during a building repainting project. The residue consisted of paint and abrasive mixtures and was, due to the presence of lead, characterized as hazardous waste (D008). Continuing in 1997, the MTA removed a light ballast contaminated with PCB oil. The waste ballast was assigned the Maryland Hazardous Waste # M002, indicating a PCB concentration of between 50 and 500-ppm present within the ballast oil.

HAZARDOUS WASTE MANAGEMENT

All hazardous wastes are removed from the designated satellite accumulation points and stored within a secondary containment area. The area is located within the building utilized for light maintenance and vehicle painting activities. The area has been constructed with concrete flooring that is continuous with a concrete berm. During my inspection of the area, I observed one 55-gallon drum identified as containing paint related wastes. The drum was identified in accordance with the requirements described at COMAR 26.13.03.05 E(1). An accumulation start date of 06/16/99 was inscribed on the drum.

During my inspection of both facility buildings, I observed the various locations where

hazardous wastes are generated, including the various parts cleaning machines, the air conditioner shop, the engine cleaning and degreasing area and the vehicle painting shop. All hazardous wastes accumulated in these locations were managed in accordance with the requirements pertaining to satellite accumulation, as described within COMAR 26.13.03.05 E(3)

RECORD KEEPING

I reviewed Hazardous Waste Manifests dated from 1997. All manifests were completed in accordance with the requirements described at COMAR 26.13.03.04. On 6/14/99, as described on hazardous waste manifest # NJA3018316, the MTA shipped approximately 440 gallons of various hazardous waste liquid (F002 and D009) and waste paint related materials (D001) to Cycle Chem a TSDF (NJD002000046) located in Elizabeth New Jersey. During my review of that manifest, I determined that the MTA did not possess a copy of the LDR Notification which, according to Mr. Heine, was documented for that shipment. Mr. Heine will contact the TSDF and determine the status of the Notification and request that a copy be mailed to MDE in a timely manner.

The MTA documents Hazardous Waste Biennial Reports, in accordance with the requirements outlined at COMAR 26.13.03.06 B. The most recent report included information concerning hazardous wastes generated during 1997. During that year, the MTA generated approximately 3,250 kilograms per month of hazardous wastes.

The MTA maintains an SPCC plan for all oil operations maintained at the facility. The MTA is in the process of drafting a Contingency Plan that addresses hazardous waste issues. I advised Mr. Heine to submit a copy of the plan to the Administration upon completion. The plan must include all information described at COMAR 26.13.05.04, including a facility evacuation plan and a listing of all pertinent communications and hazard mitigation equipment.

The MTA has provided Personnel Training regarding the "Right to Know" requirements. However, specific training pertaining to hazardous waste management and mitigation, as described within COMAR 26.13.05.02 G, has not been provided.

OUTSTANDING ISSUES

With regards to the above, the MTA must address the following issues and comply with COMAR 26.13 as referenced below.

1) In accordance with COMAR 26.13.03.03, the MTA must characterize the nature of all solid wastes. Therefore, the MTA must characterize the filter cartridge wastes generated from the antifreeze recycling operation. If the cartridges are determined to be hazardous wastes, those cartridges must be handled in accordance with all applicable requirements of COMAR 25.13.03 through 26.13.07.

2) In accordance with COMAR 26.13.05.02 G, as directed by 26.13.03.05 E(1), the MTA must provide Personnel Training for all personnel involved in anyway with the handling of hazardous wastes. Therefore, the MTA must provide training and instruction specific for

hazardous waste operations performed at the Washington Boulevard facility.

3) In accordance with COMAR 26.13.04, as directed by 26.13.03.05 E(1), the MTA must provide a hazardous waste Contingency Plan. Therefore, the MTA must update the written emergency procedures to include information that addresses contingencies pertaining to hazardous wastes.

4) In accordance with the requirements pertaining to Land Disposal Restrictions (LDR), 40 CFR parts 261 through 268, the MTA must maintain certain records, including LDR notification forms. Therefore the MTA must obtain a copy of the LDR Notification which addresses those hazardous wastes documented on Hazardous Waste Manifest # NJA3018316.

CONCLUSION

Waste management practices (storage and removal operations), as currently pursued by the MTA, are usually adequate to handle the solid wastes in accordance with the applicable regulations. However, as described above, the MTA must update waste management practices to include waste characterizations of the filter cartridge wastes and the possibility of handling those wastes as hazardous wastes.

Based upon information regarding generated quantities of hazardous wastes, supplied within hazardous waste manifests and the 1997 Hazardous Waste Biennial Report, the MTA is accurately identified as an LQG.